

June 24, 2004

Mr. Dane K. Snowden
Chief, Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Video Relay Service
Docket 98-67

Dear Mr. Snowden:

The representatives of the organizations listed below, collaborating as the National Video Relay Service Coalition and representing a cross section of the deaf and hard of hearing population, recommend **against** accepting the compensation rate for Video Relay Service proposed by the National Exchange Carrier Association ("NECA") on May 3, 2004. Any further reduction in the new VRS interim compensation rate set at the Commission's June 10, 2004 meeting would adversely affect the quality and availability of VRS. For this reason, we request a meeting with you to discuss the points raised in this letter prior to the Commission actually considering any action that would reduce the interim compensation rate.

We as a group are concerned about the course that Video Relay Services is currently undergoing at the Commission. The rate reductions for VRS that were implemented last year have resulted in a significant reduction in both the availability and quality of service. Any future reductions in the interim rate would result in a continuing deterioration of service. Therefore, we strongly urge the Commission not to enact any additional VRS compensation rate reductions until after the Commission has determined the appropriate cost recovery methodology for VRS pursuant to the Further Notice of Proposed Rulemaking adopted at the June 10, 2004 meeting.

Many of the parties listed below have recently filed comments regarding the latest proposed reimbursement rates for VRS. Each of those parties incorporates by reference those comments in this letter. VRS is the most functionally equivalent relay service for those of us who are deaf or hard of hearing and depend on visual communication such as American Sign Language (ASL), and/or signed or oral transliteration. The lack of quality and availability of VRS hinders us in our work, in our ability to communicate with our families, and in our ability to fully integrate into society. We believe this situation is contrary to both the spirit and letter of Section 225 of the Communications Act, and deserves your immediate attention. Title IV of the Americans with Disabilities Act

encourages the Commission to prescribe regulations to implement development of improved technologies; “The Commission shall ensure that regulations prescribed to implement this section encourage, consistent with section 157(a) of this title, the use of existing technology and do not discourage or impair the development of improved technology”. The FCC relied on this provision when it first authorized VRS back in March of 2000. However, the video relay services now being provided are substandard. Any future reduction in VRS compensation rates would cause even greater deterioration in service.

Please contact Kelby Brick (brick@nad.org) or Claude Stout (TDIExDir@aol.com) at your earliest opportunity so that we can arrange a meeting to discuss this letter. We look forward to addressing these very important issues with you.

Very truly yours,



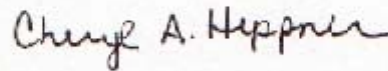
Kelby N. Brick
National Association of the Deaf



Andrew J. Imparato
American Association of People with Disabilities



Claude Stout
Telecommunications for the Deaf, Inc



Cheryl Heppner
Deaf and Hard of Hearing Consumer Advocacy
Network

/s/

Paul J. Singleton
Deaf and Hard of Hearing in Government

/s/

Sheri A. Farinha
California Coalition of Agencies Serving the Deaf and
Hard of Hearing, Inc.

On behalf of:

Deaf and Hard of Hearing Consumer Action Network (DHHCAN)

Members of DHHCAN include American Association of the Deaf-Blind (AADB), ADARA, Association of Late-Deafened Adults (ALDA), American Society for Deaf Children (ASDC), Conference of Educational Administrators of Schools and Programs for the Deaf (CEASD), CSD (formerly known as Communication Service of the Deaf), Deaf Seniors of America (DSA), Gallaudet University, Gallaudet University Alumni Association (GUAA), Jewish Deaf Congress (JDC), National Association of the Deaf (NAD), National Black Deaf Advocates (NBDA), National Catholic Office of the Deaf (NCOD), Registry of Interpreters for the Deaf (RID), TDI, Inc. (formerly known as Telecommunications for the Deaf Inc.), USA Deaf Sports Federation (USADSF), and WGBH.

National Association of the Deaf
Telecommunications for the Deaf, Inc.
American Association of People with Disabilities
Deaf and Hard of Hearing in Government, Inc.
Student Body Government of Gallaudet University
Registry of Interpreters for the Deaf, Inc.
California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc.

Cc: Chairman Michael K. Powell
Commissioner Kathleen Q. Abernathy
Commissioner Michael Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein